SEP 23 1981

ACTION MEMORANDUM - ARCO/SOHIO - Prudhoe Bay, Alaska

Lloyd A. Reed, Director /s/ Lloyd A. Reed Enforcement Division (M/S 517)

John R. Spencer Regional Administrator (M/S 601)

### BACKGROUND

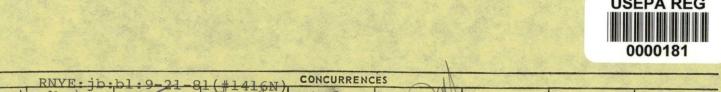
ARCO/SOHIO would like to utilize permitted emissions from a previously permitted PSD source that has not yet been constructed to cover emissions from the equipment needed at Gathering Center No. 3 (GC-#3) in the Prudhoe Bay oilfield. The Company requested the replacement of a permitted 17 MHP turbine with a 5 MHP and 3.5 MHP turbine resulting in a no net increase situation (Section 52.21(b)(3)). At our request, the Company supplied an ambient impact evaluation demonstrating the change in impacts due to the changes in turbine size from the original permit. Because the exact turbine size was not finalized when the PSD permit application was submitted, the Company has requested that the appropriate changes be reflected in PSD permit number PSD-X79-05.

# DISCUSSION

Our technical staff has reviewed the submitted information and conclude that the emission impacts at GC-#3 will not increase as a result of the "swap". Emissions and impacts are less than those in the original permit. This action would increase by one the number of turbines permitted in permit No. PSD-X79-05. The emission limitations stated in the PSD permit apply to the proposed sources.

## RECOMMENDATION

The staff recommendation is that you sign the letter to Mr. Norgaard and Mr. Nelson. Because the offsets result in a no net increase, it does not seem appropriate to reopen the permit for the public comment period.



RNYE: jb: bl: 9-21-81 (#1416N)

SURNAME NYE JOHNSTON GEREN REED. COATE SPENCER

DATE 9-21-8/ 9/22 9/23

EPA Form 1320-1 (12-70)

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UNITED STATES ENVIRONMENTAL PROTECTION GENCY

DATE: SEP 23 1981

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John R. Spencer

TO: Regional Administrator (M/S 601)

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